

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

FILED

DEC 19 2022

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

Christopher Phillips

Plaintiff

vs. VIC Regalado in his official  
CAPACITY OF Sheriff of Tulsa County  
E CHAPLIN BELL

Case Number:  
(To be supplied by Court Clerk)

22 CV - 551 GKF - SH

Defendant(s)

Current Location (including Address) of Confinement :

300 N Denver Tulsa  
OK, 74103

Prisoner Number:

1208461

## CIVIL RIGHTS COMPLAINT PURSUANT TO 42 U.S.C. § 1983

## A. Parties

1) Christopher Phillips is a citizen of OKlahoma who presently resides at  
(Plaintiff) (State)

300 N Denver Tulsa, OK 74103  
(Mailing address or place of confinement)

2) Defendant VIC REGALDO is a citizen of TULSA, OK  
(Name of first defendant) (City, State)

and is employed as Elected Sheriff of Tulsa County  
(Position and title, if any)

At the time the claim(s) alleged in this complaint arose, was this defendant acting under the color of state law? ☒ Yes ☐ No

If your answer is yes, briefly explain: IN Charge of the Jail  
Sheriff of Tulsa County

3) Defendant Chaplin Bell is a citizen of Tulsa OK  
(Name of second defendant) (City, State)

and is employed as Chaplin For Tulsa Sheriffs Office  
(Position and title, if any)

At the time the claim(s) alleged in this complaint arose, was this defendant acting under the color of state law? ☒ Yes ☐ No

If your answer is yes, briefly explain: Denied me my Kosher meals

[You may attach one additional page (8 1/2" x 11") to furnish the above information for additional defendants.]

## B. Jurisdiction

1) Jurisdiction is asserted pursuant to: (Check one)

☐ 42 U.S.C. §1983 (applies to state prisoners)

☐ *Bivens v Six Unknown Named Agents of Fed. Bureau of Narcotics*  
403 U.S. 388 (1971) and 28 U.S.C. §1331 (applies to fed. prisoners)

2) Jurisdiction also is invoked pursuant to 28 U.S.C. §1343(a)(3). (If you wish to assert jurisdiction under different or additional statutes, you may list them below.)

## C. Nature of Case

1) Briefly state the background of your case. I am muslim and I'm  
being denied my religious diet because I don't  
have a Imam to verify I'm muslim after effect being  
on the religious diet before

## D. Cause of Action

1) I allege that the following of my constitutional rights, privileges or immunities have been violated and that the following facts form the basis for my allegations: [If necessary, you may attach up to two additional pages (8 1/2" x 11") to explain any allegation or to list additional supporting facts.]

a) (1) Count I: VIOLATION OF RLUIPA

(2) Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

10-10-22 was taken off my religious meal for  
giving a lot of carrots & salad to other  
prisoners on KOSAR. I am muslim

b) (1) Count II: I was told personally by Chaffin Bell  
to really and I would get my meal back  
but he continued to deny me because I  
do not have an Imam to verify I'm muslim

- (2) Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

the Imam was not needed the  
first time but all of a sudden I needed  
now after they took all Muslims off  
in my pod

- c) (1) Count III: VIOLATION OF MY 1ST AMENDMENT  
RIGHT TO FREELY PRACTICE MY  
RELIGION

- (2) Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

they denied me my kosher  
meals

**E. Request for Relief**

- 1) I believe that I am entitled to the following relief: \$ 250,000 and  
my religious diet reinstated

Original Signature of Attorney (if any)

CHRIS PHILIPPS  
Original Signature of Plaintiff

Attorney's full address and telephone number

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares (or certifies, verifies, or states) under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained therein is true and correct. 28 U.S.C. §1746. 18 U.S.C. §1621.

Executed at 300 W Denver Ave, OK 74103 on 12-10-22  
(Location) (Date)

Charles Christopher Wheeler  
(Original Signature of Plaintiff)

I am currently incarcerated under my birth name  
Charles Christopher Wheeler

